

November 20, 2001
Magalie Roman-Salas
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

**Re: Ex Parte, Implementation of the Pay Telephone Reclassification and
Compensation Provisions of the Telecommunications Act of 1996, CC Docket
No. 96-128.**

Dear Ms Salas:

On November 19, 2001, Larry Fenster and Mary Brown from WorldCom, Jeb Benedict and Richard Juhnke from Sprint, Richard Rubin and Robert Quinn from AT&T, and Gina Keeney from Lawler, Metzger & Milkman, met with Jordan Goldstein, Senior Legal Advisor to Commissioner Copps, to discuss issues associated with the implementation of the Second Order on Reconsideration in the above-captioned proceeding.

At the meeting, we explained that a completion factor could be used as a proxy to determine compensable calls routed to switch-based resellers. We explained that both interexchange carriers and switch-based resellers had submitted call completion data by users of their pre-paid card products, and that the Commission had sufficient record evidence to determine a reliable call completion factor. We explained that underlying carriers would be able to manage their new payphone compensation obligations efficiently provided the Commission established a single call completion factor. We stressed that the administrative efficiencies would not materialize if underlying carriers were required to utilize call completion data from individual resellers. We provided a copy of a letter, which is attached, explaining our proposal in more detail. Finally, we explained that giving resellers the discretion to compensate payphone service providers directly with the aid of a clearinghouse would be administratively infeasible unless the Commission were to apply this compensation approach to all resellers.

Sincerely,

Larry Fenster

Larry Fenster
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